

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (CCC)
Consolidated with
CIVIL NO. 97-2437 (CCC)

MOTION

TO THE HONORABLE COURT:

NOW COMES co-defendant Crowley Towing and Transportation Co. (hereinafter “Crowley”), through the undersigned attorneys, and very respectfully states and prays as follows:

1. On March 4, 2005 Plaintiffs Reinaldo Ilarraza and Ángel Ortiz Angleró and Co-defendants Crowley Towing and Transportation Co. and the Seafarers International Union, Atlantic, Gulf, Lakes and Inland Waters District/NMU, AFL-CIO filed a Stipulation for Dismissal in relation to the consolidated cases of caption.

2. The parties are still in the process of obtaining the signatures in the Confidential Settlement and General Release Agreement and the Stipulation for Dismissal to be filed concerning the settlement of Plaintiffs Luis Álvarez and Miguel Vázquez. The parties intend to file these documents on or before the Court ordered date of March 17, 2005.

WHEREFORE, it is respectfully requested from this Honorable Court to take that it takes notice of the above stated.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of March, 2005.

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CERTIFICATE OF SERVICE: We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Ana R. Biascoechea, Esq., biascoechea@microjuris.com, and Ellen Silver, Esq., esilver@seafarers.org. We also certify that we have mailed by United States Postal Service the document to the following non CM/EDF participants: J. H. Zidell, Esq., City National Bank Building, 300 71st St., Suite 605, Miami Beach, FL 33141 and Luis A. Suárez, Esq., 2108 Ave. Borinquen, San Juan, P.R. 00915.

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s/**RAQUEL M. DULZAIDES**
USDC-PR No. 201406